REMARKS

Reconsideration of the present application, as amended, is respectfully requested. Claims 22 have been amended. Claim XYZ has been canceled without prejudice. Claims XYZ have been added.

Claim 22 is objected to because of the following informalities: "predetermined setting comprising a value" needs to be changed to --predetermined setting comprises a value--. Applicants have amended claim 22, and request withdrawal of this rejection.

Claim 22 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants have amended claim 22 to include proper antecedent basis. Therefore, Applicants respectfully request withdrawal of this rejection.

Claims 1-4, 9-10, 15-17, and 23-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 5,893,127 by Tyan et al. (hereinafter "Tyan") in view of U.S. Patent Number 6,496,206 by Mernyk et al. (hereinafter "Mernyk"). Note that Applicants have grouped rejections from #7, #14, and #15, as they were rejected over the same two references.

Tyan discloses a method to generate a bit map image on a web page written in HTML and preserve the layout information of the bit map image from the file for displaying the image. The HTML file making up that web page may contain multiple windows of images, text on the web page, hyperlinks on the web page, icons, etc. Each window may display the bit map image from a storage source. The displayed image

may illustrate regions of text, pictures, data, etc. The regions of the bit map image may be categorized into a hierarchical assembly of blocks to assist in preserving layout information of the original bitmap image during the reassembly process. As the Examiner acknowledges, Tyan does not disclose a hierarchical system of folders accessible through the displayed image.

Mernyk discusses a graphical user interface for accessing a large number of files, that allows quick glances of "thumbnails" or highly reduced versions of the files. When a folder is opened, every file in the folder is opened as a background operation and thumbnail data, such as a reduced image or text summary of the file, is derived and retained in a cache folder for quick access. When a cursor is touched, without a mouse-click, to a particular icon in the opened folder, the thumbnail for the file identified by the icon is accessed from the cache folder and displayed. (Mernyk, Abstract). Mernyk thus creates thumbnails of each image within a folder. However, Mernyk's images have no additional data associated with them. The Examiner refers to the Abstract, and to column 3, lines 29-50. However, in those sections, Mernyk simply discusses the definitions of thumbnails, folders, and icons.

Mernyk describes the process as follows: When a particular folder having files therein is opened by the user, a corresponding "cache folder" is created on an ad-hoc basis. The cache folder is a folder of files of thumbnail data, but each file in the cache folder corresponds to and is associated with a file in the folder which is displayed to the user. (Mernyk, column 4, lines 40-45). The thumbnails associated with different files are displayed, according to a preferred embodiment of the present invention, whenever the cursor or other pointing device merely touches or comes within a certain range of the

icon associated with a particular file, such as at steps 104. It is preferable to display the

thumbnail when the cursor is merely touching the icon, as opposed to requiring, for

example, one or two mouse-clicks or equivalent to be provided by the user. Once again,

the overall purpose of the thumbnail display is simply to give a "quick glance" at the

thumbnail associated with the file. (Mernyk, column 5, lines 15-25). Thus, each file in

the folder of Mernyk has one associated thumbnail image, which is made available

without requiring clicking.

Claim 1, on the other hand, recites:

> An apparatus, comprising:
> a computer readable media; and
> a program written in a page description language and embedded
> on the computer readable media, the program to provide instructions,
> which when executed by a machine, cause the machine to display and to
> manipulate a bitmap image within a window in a network system, the
> bitmap image having a hierarchical system of folders containing additional
> content associated with the bitmap image, wherein the hierarchical system
> of folders is accessible through the displayed image.

(Claim 1). Neither Tyan nor Mernyk teaches or suggest "a hierarchical system of

folders containing additional content associated with the bitmap image, wherein the

hierarchical system of folders is accessible through the displayed image." As noted by

the Examiner, Tyan does not teach or suggest a hierarchical system of folders. Mernyk

does not teach or suggest a hierarchical system of folders containing additional content

associated with the bitmap image, wherein the folders are accessible through the

displayed image. Rather, Mernyk discusses associating a single bitmap image with

each file in a folder. Mernyk does not teach or suggest additional content associated

with the bitmap image stored in hierarchical folders. Therefore, claim 1 is not obvious

over Tyan in view of Mernyk. Claims 2-4 depend on claim 1 and incorporate its

limitations. Therefore, claims 2-4 are not obvious over Tyan in view of Mernyk for at

least the reasons advanced above with respect to claim 1.

Claim 9 recites:

> A method, comprising:
> creating a window, the window being defined by a page description language;
> displaying in the window a bitmap image having a hierarchical system of folders having additional content associated with the bitmap image;
> accessing the hierarchical system of folders through the displayed image; and
> enabling manipulation of the bitmap image in the window.

(Claim 9). As noted above, neither Tyan nor Mernyk teach or suggest a bitmap

image having a hierarchical system of folders having additional content associated with

the bitmap image. The folder data in Mernyk does not have bitmap image associated

data, and Tyan does not teach or suggest a hierarchical system of folders at all.

Therefore, claim 9 is not obvious over Tyan in view of Mernyk. Claim 10 depends on

claim 9 and incorporates its limitations. Therefore, claim 10 is not obvious over Tyan in

view of Mernyk for at least the reasons advanced above with respect to claim 9.

Claim 15 recites:

> An apparatus, comprising:
> an image viewer to display and to enable manipulation of a bitmap image within a window in a network system, the bitmap image having a hierarchical system of folders containing additional content associated with the bitmap image and accessible through the displayed image.

(Claim 15). As noted above, neither Tyan nor Mernyk teach or suggest bitmap

image having a hierarchical system of folders containing additional content associated

with the bitmap image and accessible through the displayed image. Therefore, claim 15

is not obvious over Tyan in view of Mernyk. Claims 16-17 and 23 depend on claim 15

and incorporate its limitations. Therefore, claims 16-17 and 23 are not obvious over

Tyan in view of Mernyk for at least the reasons advanced above with respect to claim 15.

Claim 24 recites:

> An apparatus, comprising:
> means for creating a window, the window being defined by a page description language;
> means for displaying in the window a bitmap image having a hierarchical system of folders having additional content associated with the bitmap image;
> means for accessing the hierarchical system of folders through the displayed image; and
> means for enabling manipulation of the bitmap image in the window.

(Claim 24). As noted above, neither Tyan nor Mernyk teach or suggest a bitmap image having a hierarchical system of folders having additional content associated with the bitmap image, nor accessing the hierarchical system of folders through the displayed image. Therefore, claim 24 is not obvious over Tyan in view of Mernyk. Claim 25 depends on claim 24 and incorporates its limitations. Therefore, claim 25 is not obvious over Tyan in view of Mernyk for at least the reasons advanced above with respect to claim 25.

Claims 5-6, 11-13, 18-19, and 26-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tyan in view of Mernyk, and further in view of U.S. Patent Number 6,545,687 by Scott et al. (hereinafter "Scott"). Note that Applicants have grouped rejections from #8, #10, and #11, as they were rejected over the same three references.

Scott manipulates thumbnail images as used in image-based browsing file management systems. Scott provides a system in which zooming in and out of thumbnail images can be performed without a continued need to decompress a true

image thus providing for faster operation. (Scott, Abstract). However, Scott does not teach or suggest "a hierarchical system of folders containing additional content associated with the bitmap image, wherein the hierarchical system of folders is accessible through the displayed image."

Claims 5-6 depend on claim 1, and incorporate its limitations. As noted above, the combination of Tyan and Mernyk does not teach or suggest "a hierarchical system of folders containing additional content associated with the bitmap image, wherein the hierarchical system of folders is accessible through the displayed image" limitation of claim 1. Scott does not remedy this shortcoming of the references. Therefore, claims 5-6 are not obvious over the combination of Tyan, Mernyk, and Scott.

Claims 11-13 depend on claim 9, and incorporate its limitations. As noted above, the combination of Tyan and Mernyk does not teach or suggest "a bitmap image having a hierarchical system of folders having additional content associated with the bitmap image" limitation of claim 9. Scott does not remedy this shortcoming of the references. Therefore, claims 11-13 are not obvious over the combination of Tyan, Mernyk, and Scott.

Claims 18-19 depend on claim 15, and incorporate its limitations. As noted above, the combination of Tyan and Mernyk does not teach or suggest "the bitmap image having a hierarchical system of folders containing additional content associated with the bitmap image and accessible through the displayed image" limitation of claim 15. Scott does not remedy this shortcoming of the references. Therefore, claims 18-19 are not obvious over the combination of Tyan, Mernyk, and Scott.

Claims 26-28 depend on claim 24, and incorporate its limitations. As noted above, the combination of Tyan and Mernyk does not teach or suggest "a bitmap image having a hierarchical system of folders having additional content associated with the bitmap image, nor accessing the hierarchical system of folders through the displayed image" limitation of claim 24. Scott does not remedy this shortcoming of the references. Therefore, claims 26-28 are not obvious over the combination of Tyan, Mernyk, and Scott.

Claims 7-8 and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Tyan in view of Mernyk, and further in view of U.S. Patent Number 6,392,670 by Takeuchi et al. (hereinafter "Takeuchi").

Takeuchi discuses a mechanism to provide a system, etc., for making the user read a setup instruction manual of a device in order for enabling the user to set up the device reliably. Applicants firstly note that Takeuchi is from a non-analogous art, i.e. image display is non-analogous to making user's read instruction manuals. Applicants respectfully submit that the combination suggested by the Examiner uses hindsight to combine Takeuchi with Tyan and Mernyk. One of skill in the art would not look to Takeuchi for any modification to Tyan or Mernyk. Therefore, Applicants respectfully submit that Takeuchi cannot be used as a reference. Furthermore, Takeuchi does not teach or suggest a hierarchical system of folders containing data associated with a bitmap image.

Claims 7-8 depend on claim 1, and incorporate its limitations. As noted above, the combination of Tyan and Mernyk does not teach or suggest "a hierarchical system of folders containing additional content associated with the bitmap image, wherein the

hierarchical system of folders is accessible through the displayed image" limitation of claim 1. Takeuchi does not remedy this shortcoming of the references. Therefore, claims 7-8 are not obvious over the combination of Tyan, Mernyk, and Takeuchi.

Claim 14 depends on claim 9, and incorporates its limitations. As noted above, the combination of Tyan and Mernyk does not teach or suggest "a bitmap image having a hierarchical system of folders having additional content associated with the bitmap image" limitation of claim 9. Takeuchi does not remedy this shortcoming of the references. Therefore, claims 14 is not obvious over the combination of Tyan, Mernyk, and Takeuchi.

Claims 20-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tyan and Mernyk as applied to claim 15, in view of Scott as applied to claim 18, and further in view of Takeuchi.

Claims 20-21 depend on claim 15, and incorporate its limitations. As noted above, none of the references, alone or in any combination, teach or suggest "the bitmap image having a hierarchical system of folders containing additional content associated with the bitmap image and accessible through the displayed image" limitation of claim 15. Therefore, claims 20-21 are not obvious over the suggested combination of references.
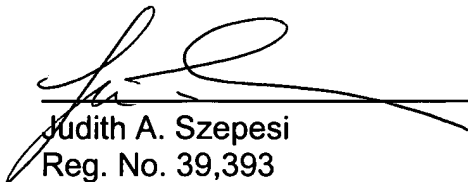
Applicant respectfully submits that in view of the discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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